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May 3, 2019

VIA ECF

Hon. Joseph A. Dickson
United States Magistrate Judge
Martin Luther King Building & U. S. Courthouse
50 Walnut Street, Room 4015
Newark, NJ 07101

Re: United States of America v. Borough of Woodcliff Lake, et al.
Civil Action No. 2:18-cv-10511 (JLL-JAD), and
Valley Chabad, et al. v. Borough of Woodcliff Lake, et al.
Case No.: 2:16-08087 (JLL-JAD)

Dear Judge Dickson:

The Court has asked me to report on the status of settlement discussions, as of May 3, 2019:

Reference is made to the status report dated March 1, 2019 (Dkt. No. 61). Since counsels' in person settlement meeting on February 20, 2019, Plaintiffs' counsel prepared a draft framework for addressing the land use requirements, among other elements of a potential settlement. The parties subsequently exchanged drafts of that framework. This week, counsel for Valley Chabad provided a revised framework that will provide the basis for ongoing discussions.

The parties have had some disagreements regarding the structure of any proposed settlement and believe that all parties would benefit from the Court's assistance at this time. On behalf of all parties, we therefore respectfully seek the Court's assistance with settlement and request that Your Honor schedule a settlement conference before the Court.



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All parties have reviewed and approve of this report.

Thank you for Your Honor's attention.

Respectfully submitted,

s/Henry E. Klingeman
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cc: All counsel of record via ECF